

ROBERT G. BERNHOFT, ESQ
Wisconsin Bar No. 1032777
THE BERNHOFT LAW FIRM, S.C.
1402 E. Cesar Chavez Street
Austin, Texas 78702
(512) 582-2100 telephone
(512) 373-3159 facsimile
rgbernhof@bernhoflaw.com

JOEL F. HANSEN, ESQ.
Nevada Bar No. 1876
HANSEN & HANSEN, LLC
9030 W. Cheyenne Avenue, #210
(702) 906-1300 office
(702) 366-1857: facsimile
efile@hansenlawyers.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC.,
AMERICAN TECHNOLOGY SERVICES,
COMPLIANCE CONSULTANTS,
CHROME BUILDERS CONSTRUCTION,
INC., and UNIFIED DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A. and JOHN
and JANE DOES 1-100,

Defendants.

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO STAY
MAGISTRATE JUDGE'S ORDER [ECF
NO. 192]**

Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the "Plaintiffs"), and the Defendant Bank of America (hereinafter "BOFA"), by and through their respective attorneys of record, hereby jointly stipulate to stay the Magistrate Judge's Order (hereinafter "Order") regarding the Plaintiffs' Motion for Sanctions pursuant to Fed. R. Civ. P. 30(b)(6). (Doc. 192.) On November 4, 2021, BOFA filed an Objection to the Order. (Doc. 200.)

After conferring, the Parties stipulate to stay the Order until such time that the Hon. District Court Judge Boulware resolves BOFA's Objections to that Order. The Parties agree that the Objection should be resolved before BOFA's 30(b)(6) witness is re-deposed or the fee sanction resolved, in the legitimate interest of potentially avoiding the unnecessary consumption of time and resources.

For the foregoing reasons, the Parties stipulate to stay the Magistrate Judge's Order filed as Doc. 192 until such time that Judge Boulware adjudicates BOFA's Objection filed at Doc. 200.

IT IS SO STIPULATED.

Dated: November 11, 2021
THE BERNHOFT LAW FIRM, S.C.

Dated: November 11, 2021
SNELL & WILMER, L.L.P.

/s/ Robert G. Bernhoft
Robert G. Bernhoft, Esq.
Wisconsin Bar No. 1032777
1402 E. Cesar Chavez Street
Austin, Texas 78702

*Attorney for Plaintiffs
Appearing pro hac vice*

/s/ Holly E. Cheong
Amy F. Sorenson (NV Bar 12495)
Blakeley E. Griffith, Esq. (NV Bar 12386)
Holly E. Cheong (NV Bar 11936)
3883 Howard Hughes Pkwy., Ste. 1100
Las Vegas, Nevada 89169

Attorneys for Bank of America, N.A.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: 11/12/2021

Certificate of Service

I hereby certify that on November 11, 2021, I electronically filed and served the foregoing second JOINT STIPULATION TO STAY MAGISTRATE JUDGE'S ORDER [ECF NO. 192] with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Robert G. Bernhoft

Robert G. Bernhoft
Attorney for Plaintiffs